

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

ERNEST PADILLA, PERSONAL REPRESENTATIVE  
OF THE ESTATE OF ROBERT DOTSON, DECEASED;  
KIMBERLY DOTSON,  
INDIVIDUALLY AND AS PARENT AND NEXT FRIEND  
OF JULIA  
DOTSON; AND ZACHARY-MORA DOTSON,

Plaintiffs,

vs.

CITY OF FARMINGTON, NEW MEXICO;  
DANIEL ESTRADA; DYLAN GOODLUCK;  
AND WAYLON WASSON

Defendants.

Case No. 1:23-cv-00790-MLG-KK

**MOTION TO DISMISS KIMBERLY DOTSON'S FEDERAL CLAIM**

Plaintiff Kimberly, by and through her undersigned attorneys, has previously withdrawn her individual claim under federal law set forth in the First Claim for Relief in Plaintiffs' Second Amended Complaint, and now requests the Court to dismiss said claim with prejudice pursuant to Rule 41 (a) (2) of the Federal Rules of Civil Procedure.

Defendants agree to this dismissal of this claim with prejudice.

Respectfully submitted,

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Attorneys for Plaintiffs

Agreed:

/s/ Luis Robles

Luis Robles

**Certificate of Service**

I hereby certify that the foregoing was electronically filed through the CM/ECF on this 11<sup>th</sup> day of July 2025, which caused counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

**E-SERVICE**

Luis Robles